

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GENLYTE THOMAS GROUP LLC,

Plaintiff/Counterclaim Defendant,
v.

ARCHITECTURAL LIGHTING SYSTEMS, a
division of ARCH LIGHTING GROUP,

Defendant/Counterclaimant.

Civil Action No. 05-CV-10945 WGY

DEFENDANT'S PROPOSED VOIR DIRE

Defendant, Arch Lighting Group, Inc. ("ALS") hereby requests that the following *voir dire* questions be asked of potential jurors.

1. Do you know or have you had any business or personal interaction with any of the following individuals:

- A. William Fabbri
- B. Roy Crane
- C. Michael E. Tate
- D. Thomas M. Lemons
- E. Scott Davis
- F. Paul Northrup
- G. Ian Lewin.

2. Currently or in the past, have you, any family member or any close friend worked for any of the following companies:

- A. Genlyte Thomas Group LLC

- B. Lightolier
 - C. Architectural Lighting Systems
 - D. Arch Lighting Group Inc.
3. If the answer to question 2 is “Yes”, ask:
- a. who worked for one of these companies?
 - b. if other than you, what is your relationship to the person?
 - c. what company did the person work for?
 - d. when did the person work for that company?
4. Currently or in the past, have you, any family member or any close friend worked for any manufacture, wholesaler, or retailer of lighting fixtures?
5. If the answer to question 4 is “Yes”, ask:
- a. who worked for one of these companies?
 - b. if other than you, what is your relationship to the person?
 - c. what company did the person work for?
 - d. when did the person work for that company?
6. Currently or in the past, have you, any family member or any close friend worked as or for an independent sales representative?
7. If the answer to question 6 is “Yes”, ask:
- a. who worked as an independent sales representative?
 - b. if other than you, what is your relationship to the person?
 - c. what types of products were being sold?
 - d. when did the person work as an independent sales representative?

8. Have you ever worked in the construction industry? If so, what work have you done in the construction industry?

9. Currently or in the past, have you, any family member or any close friend worked in a hospital or other medical facility?

10. If the answer to question 9 is "Yes", ask:

- a. who worked in a hospital or other medical facility?
- b. if other than you, what is your relationship to the person?
- c. what hospital or other medical facility?

11. Have you ever been named as an inventor for any patent or patent application? If so, what was the subject matter of the patent?

12. Have you, any family member, or any company you or a family member has worked for ever been accused of infringing a patent? If so, what was the subject matter patent and what was the outcome?

13. Have you, any family member, or any company you or a family member has worked for ever sued anyone else for infringing a patent? If so, what was the subject matter of the patent and what was the outcome?

14. Have you or any family member ever been a party in a lawsuit? If so, what was the lawsuit about?

Respectfully submitted,

Dated: January 19, 2007

s/ Brett N. Dorny
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent by facsimile and mail to those indicated as non-registered participants on January 19, 2007.

s/ Brett N. Dorny
Brett N. Dorny